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January 10, 2025

Via ECF

The Honorable George B. Daniels
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Hall-Landers v. New York University*, Case No. 1:20-cv-03250-GBD-SLC
Request to File Under Seal

Dear Judge Daniels:

Counsel for Plaintiff respectfully requests that the Court permit Plaintiff to file material in connection with Plaintiff's Objection to Magistrate Judge Cave's December 6, 2024 Report and Recommendation (ECF No. 186) (the "Objection") provisionally under seal. Plaintiff's Objection contains material which Defendant New York University ("NYU" or "Defendant") has designated "confidential," pursuant to the Parties' Confidentiality Stipulation and Proposed Protective Order ("Protective Order"), ECF No. 88. Based on NYU's confidentiality designations, Plaintiff thus seeks to file a provisionally redacted version of the Objection.

As a result of agreeing to the Protective Order, Plaintiff is compelled to submit this motion to file the materials under seal. Much of the same material was filed provisionally under seal pursuant to the Court's July 17, 2024 Order (ECF No. 127). Plaintiff believes that Defendant will be unable to meet its burden of establishing a compelling reason for non-disclosure of the materials and information. However, the terms of the Protective Order do not afford Plaintiff the option to unilaterally disclose these materials and information by filing them on the public docket.

Thus, Plaintiff respectfully requests that the Court permit Plaintiff to electronically file an unredacted version of the Objection provisionally under seal, subject to the Court's discretion to unseal all or some portion of the filings.

Absent a ruling on Plaintiff's request to file provisionally under seal here, to comply with the Court's scheduling in this matter, Plaintiff will file a redacted version of the materials on the public docket and provide the Court and Defendant with unredacted versions separately.

Pursuant to Rule 1(D)(ii) of Your Honor's Individual Rules and Practices, undersigned counsel contacted counsel for Defendant, via email, to reach agreement on the de-designation of these materials. However, as of the date of this filing, undersigned counsel has not received a response.

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BURSOR&FISHER
P.A.

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Sincerely,

Sarah N. Westcot

Sarah N. Westcot

SO ORDERED:

George B. Daniels

George B. Daniels, U.S.D.J.

Dated: 1/27/2025